

1 Kristen T. Gallagher (NSBN 9561)
 2 McDONALD CARANO LLP
 2300 West Sahara Avenue, Suite 1200
 Las Vegas, Nevada 89102
 3 Telephone: (702) 873-4100
 Facsimile: (702) 873-9966
 4 kgallagher@mcdonaldcarano.com

5 Ann H. MacDonald (admitted *pro hac vice*)
 ARENTFOX SCHIFF LLP
 6 233 South Wacker Drive, Suite 7100
 Chicago, IL 60606
 7 Telephone: (312) 258-5500
 ann.macdonald@afslaw.com

8 Elise H. Yu (admitted *pro hac vice*)
 9 ARENTFOX SCHIFF LLP
 350 South Main Street, Suite 210
 10 Ann Arbor, MI 48104
 Telephone: (734) 222-1500
 11 elise.yu@afslaw.com

12 *Attorneys for Defendant Desert Palace LLC*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 C. C., individually,

Case No.: 2:23-cv-02056-GMN-BNW

16 Plaintiff,
 vs.

17 JAMAL F. RASHID a/k/a “MALLY
 18 MALL”; HIGHGATE HOTELS, L.P.;
 RADISSON HOSPITALITY, INC.; WYNN
 19 LAS VEGAS, LLC; DESERT PALACE
 LLC; NEVADA PROPERTY 1, LLC; ARIA
 20 RESORT & CASINO LLC; MGM GRAND
 HOTEL, LLC; STK LAS VEGAS, LLC;
 21 THE ONE GROUP, LLC; THE ONE
 GROUP HOSPITALITY, INC.; THE
 22 LIGHT GROUP, LLC; and TAO GROUP
 OPERATING, LLC,

**STIPULATION AND ORDER
 EXTENDING DEADLINE FOR
 DEFENDANT DESERT PALACE
 LLC TO RESPOND TO
 PLAINTIFF’S SECOND AMENDED
 COMPLAINT**

(FIRST REQUEST)

23 Defendants.

25 Pursuant to LR IA 6-1, Plaintiff C.C. (“Plaintiff”) and Defendant Desert Palace LLC
 26 (together, the “Parties”), by and through their respective counsel of record, hereby agree and
 27 stipulate as follows:

28 1. On March 29, 2024, this Court entered an Order on Stipulation to Dismiss Desert

1 Palace LLC without prejudice. (ECF No. 85).

2 2. On December 20, 2024, this Court dismissed Plaintiff's TVPRA claims without
3 prejudice as to most or all of the Parties. (ECF. No. 115).

4 3. That same day, this Court dismissed Plaintiff's state law claims (NRS 41.1399
5 and intentional infliction of emotional distress) with prejudice as to all of the Parties. (ECF. No.
6 115).

7 4. The Court at the same time granted Plaintiff leave to amend her complaint by
8 January 10, 2025. (ECF No. 115).

9 5. On January 10, 2025, Plaintiff filed a Motion for Leave to Amend her Complaint.
10 (ECF No. 117). Plaintiff's proposed Second Amended Complaint re-names Desert Palace LLC
11 and brings beneficiary and/or perpetrator liability claims under the TVPRA.

12 6. On January 27, 2025, this Court granted Plaintiff's Motion for Leave to Amend
13 her Complaint and directed the Clerk of Court to file Plaintiff's Second Amended Complaint on
14 the docket. (ECF No. 124).

15 7. On March 13, 2025, Plaintiff filed a returned Summons for Desert Palace LLC.
16 (ECF No. 136).

17 8. The Parties respectfully stipulate that Defendant's time to respond to the Second
18 Amended Complaint be extended from March 28, 2025 to April 11, 2025. This is Defendant's
19 first request to extend time to file a response to the Second Amended Complaint.

20 9. Good cause exists to enlarge the time for Defendant to respond to Plaintiff's
21 Second Amended Complaint because the parties have been discussing matters related to the
22 pleading and needed an opportunity to exhaust those discussions. This request is made in good
23 faith and not for purposes of delay.

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28 ///

1 WHEREAS the Parties respectfully request that Desert Palace LLC shall have until April
 2 11, 2025 to answer, move, or otherwise respond to Plaintiff's Second Amended Complaint.

3 IT IS SO STIPULATED.

4 DATED this 28th day of March, 2025.

5 McDONALD CARANO LLP

6 /s/ Kristen T. Gallagher

Kristen T. Gallagher (NSBN 9561)
 7 2300 W. Sahara Avenue, Suite 1200
 Las Vegas, NV 89102
 Telephone: (702) 873-4100
 Facsimile: (702) 873-9966
 Email: kgallagher@mcdonaldcarano.com

10 Ann H. MacDonald, *Pro Hac Vice*
 ARENTFOX SCHIFF LLP
 11 233 South Wacker Drive, Suite 7100
 Chicago, IL 60606
 Telephone: (312) 258-5500
 Facsimile: (312) 258-5600
 Email: ann.macdonald@afslaw.com

14 Elise H. Yu, *Pro Hac Vice*
 ARENTFOX SCHIFF LLP
 15 350 South Main Street, Suite 210
 Ann Arbor, MI 48104
 Telephone: (734) 222-1556
 Facsimile: (734) 222-1501
 Email: elise.yu@afslaw.com

18 *Attorneys for Defendant Desert Palace LLC*

HILTON PARKER LLC

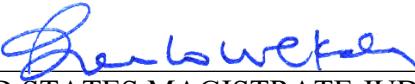
6 /s/ Geoffrey C. Parker

Geoffrey C. Parker (NSBN 16952)
 7 7658 Slate Ridge Boulevard
 Reynoldsburg, Ohio 43068
 Telephone: (614) 992-2277
 Facsimile: (614) 927-5980
 Email: gparker@hiltonparker.com

Michael C. Kane (NSBN 10096)
 Bradley J. Myers (NSBN 8857)
 Joel S. Hengstler (NSBN 11597)
 THE 702 FIRM
 400 South Seventh Street, Suite 400
 Las Vegas, NV 89101
 Telephone: (702) 776-3333
 Facsimile: (702) 505-9787
 Email: mike@the702firm.com
 brad@the702firm.com

Attorneys for Plaintiff C.C.

19 IT IS SO ORDERED:

21 
 22 UNITED STATES MAGISTRATE JUDGE

23 DATED: March 31, 2025